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multifunctional part all the components of said window regulator subassembly, and fixing said window regulator subassembly to the door inner liner.

REMARKS

The Examiner's action dated November 1, 2001, has been received, and its contents carefully noted.

In response to this action, various claims have been cancelled, and other claims have been amended to define various novel aspects of the present invention. The indication of allowability of claims 24-29 is noted with appreciation.

Concerning, firstly, the allowable claims, claims 24, 27 and 28 have been amended to place them in dependent form by incorporation therein of those portions of independent claim 18 that are associated with the novel features defined in those claims. Each of these claims defines a complete door module and includes those recitations that the Examiner considered to distinguish over the prior art.

In response to the rejection under 35 USC 112, second paragraph, claims 19, 20 and 37 have been cancelled. Claim 30 has been amended so that it now defines only a door lock subassembly. Claim 33 has been amended to define both a window regulator subassembly and a door lock subassembly, and claim 36 now simply refers to said window regulator subassembly. It is therefore believed that the recitations that the Examiner considered to be informal in those claims have been eliminated.

Nevertheless, the rejection is traversed for the reason that the claims, as originally presented, were not indefinite. Claim 18 recited "at least one of a window

regulator subassembly and a door lock subassembly". In other words, claim 18 specified that the module could have one or the other of those subassemblies. Therefore, the subsequent recitations, for example in original claim 19 that the at least one subassembly comprises the window regulator subassembly was both clear and consistent.

In view of the rejection of claims 18-23 and 30-38 as anticipated by Emerling, claims 18-20, 23, 32, 37 and 38 have been cancelled. However, claims 30, 31, 33 and 35 have been amended to place them in independent form and the rejections of those claims as anticipated by Emerling is traversed for the reason that each of those claims defines a novel structure that is not disclosed in the applied reference.

Claim 30 defines a door module that comprises "means connected to said door lock subassembly for displacing said door lock subassembly on said door trim panel from a transport position to an assembly position for attachment to the door inner liner." This feature facilitates assembly of the door trim panel to the door inner liner. There is absolutely no disclosure in Emerling of means for displacing a door lock assembly between two positions.

Claim 31 defines a door module that includes a door trim panel having a main part and a hinged part, the main part having an opening and the hinged part being pivotable relative to the main part for covering the opening. There is no disclosure of such a feature in Emerling.

Claim 33 is directed to a door module that includes a unitary metal reinforcement and support plate mounted to the door trim panel, together with both a window regulator subassembly and a door lock subassembly mounted on the plate. Here again, there is no disclosure in Emerling of a unitary

plate that carries both a window regulator subassembly and a door lock subassembly.

Finally, claim 35 defines a door module having a unitary metal reinforcement and support plate having an approximately "X" shape with two upper ends and two lower ends and arranged to be fixed to the door inner liner by the upper and lower ends. Here again, there is no disclosure in Emerling of a unitary support plate having a form defined in claim 35.

All of the other claims now in the application depend from respective ones of the independent claims discussed above.

Accordingly, it is requested that the prior art rejection of record be reconsidered and withdrawn, that all of the pending claims be allowed and that the application be found in allowable condition.

If the above amendment should not now place the application in condition for allowance, the Examiner is invited to call undersigned counsel to resolve any remaining issues.

In re of Appln. No. 09/581,946

Attached hereto is a marked-up version of the changes made to the claims by the current amendment. The attached page is captioned "Version with markings showing changes made."

Respectfully submitted,

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Version with markings to show changes made to claims $FEB = 0.6 \times 0.000$

21. (Amended) The door module of claim 2035, wherein a said window regulator subassembly is a power window regulator subassembly that comprises a motor and said motor is positioned on said door trim panel prior to assembly of said module with the door inner liner.

- 24. (Amended) The door module of claim 18, further comprising: A door module for assembly to a door inner liner of a door of an automotive vehicle, said door module comprising:
- a door trim panel that will face the interior of the vehicle;
- at least one of a window regulator subassembly and a door lock subassembly carried by said door trim panel prior to assembly of said door module to the door inner liner;
- a lower deflector arranged to be located at an upper edge of a lower portion of the door inner liner;
- a portion of elastic, foam type material below said deflector;

two support appendages that are directed towards the door inner liner when said door module is assembled to the door inner liner; and

a profile disposed between said appendages, said profile having two ends that project towards the door inner liner at different heights, when said door module is assembled to the door inner liner, to form two lines of waterproofing associated with drain holes in the door inner liner, wherein said deflector, said portion of elastic, foam type material, said two support appendages and said

profile form continuous lines between said door trim panel and the door inner liner when said door module is assembled to the door inner liner.

- 27. (Amended) The door module of claim 18, further comprising: A door module for assembly to a door inner liner of a door of an automotive vehicle, said door module comprising:
- a door trim panel that will face the interior of the vehicle;
- at least one of a window regulator subassembly and a door lock subassembly carried by said door trim panel prior to assembly of said door module to the door inner liner;
- a lower deflector arranged to be located at an upper edge of a lower portion of the door inner liner;
- a portion of elastic, foam type material below said deflector;

two support appendages that are directed towards the door inner liner when said door module is assembled to the door inner liner; and

- a longitudinal bead or strip of adhesive disposed between said appendages and the door inner liner when said door module is assembled to the door inner liner, wherein said deflector, said portion of elastic, foam type material, said two support appendages and said longitudinal bead or strip of adhesive form continuous lines between said door trim panel and the door inner liner when said door module is assembled to the door inner liner.
- 28. (Amended) The door module of claim 18 wherein: A door module for assembly to a door inner liner of a door of an automotive vehicle, said door module comprising:

a door trim panel that will face the interior of the vehicle; and

a window regulator subassembly carried by said door trim panel prior to assembly of said door module to the door inner liner, wherein

said at least one of a window regulator subassembly
and a door lock subassembly comprises said window regulator
subassembly;

said window regulator subassembly comprises window winder rails having L-shaped appendages having fins; and

said door module further comprises pairs of protruding lugs having holes, said lugs being secured to said door trim panel and said fins being held loosely in said holes of said lugs in order to maintain said rails attached to said door trim panel during transport of said door module and until said door module is assembled to the door inner liner.

30. (Amended) The door module of claim 18, A door module for assembly to a door inner liner of a door of an automotive vehicle, said door module comprising:

a door trim panel that will face the interior of the vehicle; and

a door lock subassembly carried by said door trim

panel prior to assembly of said door module to the door

inner liner, wherein said at least one of a window

regulator subassembly and a door lock subassembly comprises

said door lock subassembly,

and

said door module further comprises means connected to said door lock subassembly for displacing said door lock subassembly on said door trim panel from a transport

position to an assembly position for attachment to the door inner liner, at least a portion of said door lock subassembly projecting beyond said door trim panel when said door lock subassembly is in the assembly position.

- 31. (Amended) The door module of claim 18, A door module for assembly to a door inner liner of a door of an automotive vehicle, said door module comprising:
- a door trim panel that will face the interior of the vehicle; and
- at least one subassembly carried by said door trim panel prior to assembly of said door module to the door inner liner, wherein

said door trim panel includes a main part and a hinged part, said main part having an opening to permit access for securing said at least one subassembly to the door inner liner and said hinged part being pivotable relative to said main part for covering the opening.

- 33. (Amended) The door module of claim 18, wherein said at least one of a window regulator subassembly and a door lock subassembly comprises said door lock subassembly, and further comprising—A door module for assembly to a door inner liner of a door of an automotive vehicle, said door module comprising:
- a door trim panel that will face the interior of the vehicle;
- a <u>unitary</u> metal reinforcement and support plate mounted to said door trim panel, with said door lock subassembly being mounted to said plate; and

a window regulator subassembly and a door lock subassembly mounted to said plate prior to assembly of said door module to the door inner liner.

- 35. (Amended) The door module of claim 33, A door module for assembly to a door inner liner of a door of an automotive vehicle, said door module comprising:
- a door trim panel that will face the interior of the vehicle;
- a unitary metal reinforcement and support plate mounted to said door trim panel; and
- a window regulator subassembly mounted to said plate prior to assembly of said door module to the door inner liner, wherein:

said at least one of a window regulator subassembly and a door lock subassembly further comprises said window regulator subassembly; said plate has an approximately "X" shape with two upper ends and two lower ends and said plate is arranged to be fixed to the door inner liner by said upper and lower ends; and said window regulator subassembly is fixed to said plate.

36. (Amended) The door module of claim 33, wherein: said at least one of a window regulator subassembly and a door lock subassembly further comprises said window regulator subassembly; said window regulator subassembly has drive slides; said plate has two parallel longitudinal sides on which two edges are formed for receiving said drive slides, integrating into one single multifunctional part all the components of said window regulator subassembly, and fixing said window regulator subassembly to the door inner liner.